

Case 1:17-cv-06977-GBD Document 36 Filed 05/16/18 Page 1 of 2



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May 16, 2018

SO ORDERED

The conference is adjourned to
June 27, 2018 at 9:45 a.m.

George B Daniels
HON. GEORGE B. DANIELS

Re: *Asia TV USA Ltd. et al. v. Dibia Networks Limited, et al*, Case No. 17 Civ. 6977
Letter Requesting Adjournment of Conference Scheduled for May 23, 2018

Dear Judge Daniels:

We represent Plaintiffs Asia TV USA Ltd., MSM Asia Ltd., Star India Private Ltd., Viacom18 Media Private Limited, ARY Digital USA, and DISH Network L.L.C. (collectively “Plaintiffs”) in the above-captioned action (the “Action”). On behalf of Plaintiffs, we are writing to respectfully request a 30-day adjournment of the status conference, which is currently scheduled for May 23, 2018, to provide sufficient notice to defendants Dibia Networks Limited (“Dibia”) and Abdellah Hamead (“Hamead,” and collectively with Dibia, “Defendants”) of the conference and also for Plaintiffs to file its moving papers for a default judgment.

Given that Hamead’s recent whereabouts have been unknown since November 2017, this Court recently granted Plaintiffs leave to serve Hamead by way of email and through hand delivery on Dibia [Dkt. No. 33] (the “Order”). Plaintiffs have completed service of all prior papers filed in this Action on Hamead by email as specified in the Order. However, due to the fact that Dibia has recently changed its registered address, Plaintiff’s foreign counsel is still in the process of serving Hamead and Dibia and Dibia by hand delivery. Plaintiff’s foreign counsel has located Dibia’s new corporate address and intends to complete service by hand delivery by May 17, 2018. In light of these efforts, however, Plaintiffs respectfully request a 30-day adjournment of the status conference to ensure that Defendants have sufficient notice of the conference and developments in the case.

Additionally, Plaintiffs anticipate moving for default judgment against Defendants within a matter of weeks. Plaintiffs will of course ensure that the Defendants are properly served notice of their moving papers. Therefore, it may be most expedient to adjourn the pending status conference until such time that this motion can be discussed with the Court.

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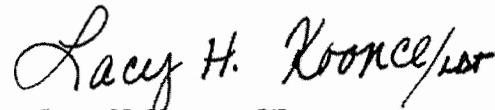
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This letter constitutes Plaintiffs' third request for an adjournment of time in this Action. The first request for a thirty-day adjournment of the initial pretrial conference was granted on November 30, 2017. The second adjournment was granted on April 11, 2018. Since Defendants have not contacted Plaintiffs and are in default in this Action, Plaintiffs have not been able to obtain the consent of Defendants to this request for an adjournment.

Respectfully yours,

Davis Wright Tremaine LLP



Lacy H. Koonce, III

cc: Dibia Networks Limited (via hand delivery)
Abdellah Hamead (via email to Hamead and hand delivery on Dibia)